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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 Jeremy Stanfield, Romonia Persaud, Shabnam
10 Sheila Dehdashtian, Saira Losoya, Eva
11 Williams, Corby McNay, Melissa Michel,
12 Richelle Pica, Scot Robbins, Mark Yehle, Eric
Dorsett , individually, on behalf of all others
similarly situated, and on behalf of the general
public,

13 Plaintiffs,

14 v.

15 First NLC Financial Services, LLC, and
16 DOES 1 through 50 inclusive,

17 Defendants.

18 Case No. C 06-3892 SBA JL

19 **CONSENT TO AMEND COMPLAINT
20 UNDER FED.R.CIV.P. 15(a),
21 STIPULATION TO TOLL CLAIMS OF
22 FUNDERS, AND [PROPOSED] ORDER**

23 Judge: Hon. Saundra B. Armstrong

24 Date Action Filed: June 22, 2006

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28 CONSENT TO AMEND COMPLAINT, STIPULATION
TO TOLL CLAIMS OF FUNDERS,
AND [PROPOSED] ORDER
C 06 3892 SBA

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16 **Attorneys for Individual and Representative Plaintiffs**

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32 **Attorneys for Defendant**
33 **First NLC Financial Services, LLC**

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1 Under Fed.R.Civ.P. 15(a), a party may amend a Complaint at any time by written consent of the
 2 adverse party.

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 4 The Parties hereby agree that Plaintiff shall file on July 24, 2007 the Fourth Amended Complaint
 5 in this matter, adding the job title of "funders" who worked in California to the complaint, and
 6 adding as named Plaintiffs Derena Sparrow-Milrot, Yvette Lawrence, and Jolene Hunt-Fleming.
 7 The Fourth Amended Complaint shall also clarify that the position of "account executives" in the
 8 complaint is intended to reference "inside account executive;"

9
 10 Defendant has denied and continues to deny each of the claims and contentions alleged by
 11 Plaintiffs in this matter, denies any wrongdoing or legal liability arising out of any of the facts or
 12 conduct alleged in this matter, believes that it has valid defenses to Plaintiffs' claims, contends
 13 that all of its employees have been compensated in compliance with the law, and that its conduct
 14 was not willful with respect to the classification of employees as exempt.

15
 16 After the Court docketes the Fourth Amended Complaint and accepts the Stipulation below,
 17 Plaintiffs intend to withdraw the case of *Derena Sparrow-Milrot, et al v. First NLC Financial*
 18 *Services, LLC*, United States District Court for the Central District of California, case No.
 19 SACV07-0119 AHS (RCx).

20
 21 In the event the Court does not certify a Rule 23 class action on behalf of the California funders,
 22 which the parties will requested as part of a settlement currently being finalized, and which will
 23 toll the statute of limitations to June 22, 2002 for all California funders' claims, then the parties
 24 stipulate, and Defendant will at no time dispute, that funders who opted-into the matter of *Derena*
 25 *Sparrow-Milrot, et al v. First NLC Financial Services, LLC*, United States District Court for the
 26 Central District of California, case No. SACV07-0119 AHS (RCx), shall have their claims tolled
 27 to the dates they opted into that matter.

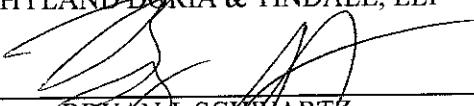
28
 CONSENT TO AMEND COMPLAINT, STIPULATION
 TO TOLL CLAIMS OF FUNDERS,
 AND [PROPOSED] ORDER
 C 06 3892 SBA

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3 The individuals who opted-into the matter of *Sparrow-Milrot, et al v. First NLC Financial*
4 *Services, LLC*, United States District Court for the Central District of California, case No.
5 SACV07-0119 AHS (RCx) shall be included in this matter.

| Last Name | First Name | Middle Name | Actual Filing Consent Date |
|------------------|------------|-------------|----------------------------|
| Alvarado | Ruben | | 01/30/2007 |
| Barnes | Cassandra | | 01/30/2007 |
| Drew | Desiree | | 03/08/2007 |
| Hood | Samantha | | 03/21/2007 |
| Hunt -Fleming | Jolene | | 03/02/2007 |
| Judge | Barbara | | 04/04/2007 |
| Ketchersid-Eagle | Lori | | 01/30/2007 |
| Kien | Julie | | 01/30/2007 |
| Lawrence | Yvette | | 01/30/2007 |
| Murphy | Sharon | | 01/30/2007 |
| Ramirez | Ramon | | 01/30/2007 |
| Romolo | Victoria | | 03/02/2007 |
| Russell | Jessica | | 04/12/2007 |
| Silva | Orlando | | 01/30/2007 |
| Sparrow-Milrot | Derena | | 01/30/2007 |

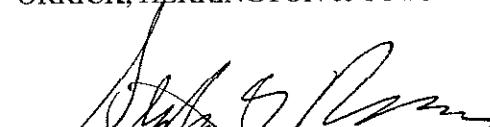
14 Dated: 7/24/07

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17 RUKIN HYLAND DORIA & TINDALL, LLP

18 By: 
19 BRYAN J. SCHWARTZ
20 Attorneys for Plaintiffs and Representative Plaintiffs

21 Dated: 7/24/07

22 NELSON MULLINS RILEY & SCARBOROUGH
23 LLP
24 ORRICK, HERRINGTON & SUTCLIFFE LLP

25 By: 
26 STEPHEN G. MORRISON
27 Attorneys for Defendant
28 First NLC Financial Services, LLC

CONSENT TO AMEND COMPLAINT, STIPULATION
TO TOLL CLAIMS OF FUNDERS,
AND [PROPOSED] ORDER
C 06 3892 SBA

1

2 ORDER

3

4 Pursuant to the parties' stipulation, it is ORDERED that individuals who opted-into the
5 matter of *Derena Sparrow-Milrot, et al v. First NLC Financial Services, LLC*, United States
6 District Court for the Central District of California, case No. SACV07-0119 AHS (RCx), shall
7 have their claims tolled to a date no later than the dates on which they opted-into that matter.

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9 Dated: 8/2/07

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Honorable Sandra B. Armstrong
United States District Court Judge